IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA, Plaintiff)
v.) Case No. 20-cv-423-JFH
JEFFREY LOWE,)
LAUREN LOWE,)
GREATER WYNNEWOOD EXOTIC ANIMAL PARK, LLC. and)))
TIGER KING, LLC.)
Defendants.)

UNOPPOSED MOTION FOR EXTENSION TO FILE RESPONSE TO THE PLAINTIFF'S MOTION FOR DAMAGES

Defendants respectfully seek an additional two weeks in which to respond to the Plaintiff's Motion for Damages [Dkt. 102]. Defendants show as follows:

- 1. Defendants' response to Plaintiff's Motion for Damages is due June 11, 2021.
- 2. The United States does not oppose a two week extension in which to respond.
- 3. The parties have been negotiating in good faith to settle the matter.
- 4. Should the parties settle, a ruling on the Motion for Damages may not be necessary at all.
- 5. Neither party will be prejudiced by the requested extension, and the Court's time may be saved to rule on the matter should the parties settle.

WHEREFORE, the Defendants respectfully pray for an Order extending the Defendants' response deadline two weeks, or to June 25, 2021.

s/Daniel J. Card

Daniel J. Card 512 NW 12th Street Oklahoma City, OK 73103 dan@cardlawok.com 580-465-4249

CERTIFICATE OF SERVICE

The undersigned, Daniel J. Card, certifies that the foregoing was served on June 11, 2021, to the following:

Mary Hollingsworth-via CM/ECF Brienna Strippoli-via CM/ECF

Mail: Jeffrey and Lauren Lowe 21469 Jimbo Road Thackerville, OK 73459

s/Daniel J. Card
Daniel J. Card